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February 28, 2020

Honorable Andrew L. Carter Jr. United States District Court Southern District of New York 40 Foley Square, Room 435 New York, New York 10007

Re: United States v. Joseph Perlman, 19-cr-531 (ALC)

Dear Judge Carter:

I represent Joseph Perlman in the above-captioned case and write with the consent of the Government and Mr. Perlman's Pretrial Services Officer in the Northern District of Georgia to request an extension of Mr. Perlman's date of surrender, which is currently set for next Sunday, March 8, 2020.

## Procedural History

We appeared before your honor for a sentencing hearing in this case on Friday, December 6, 2019. At that hearing, Your Honor recommended Mr. Perlman for designation at FPC-Montgomery, which is within driving distance of his family and his home in Georgia. Your Honor also ordered that Mr. Perlman surrender to the United States Marshal for the Southern District of New York at 10:00 am on February 7, 2020, if he had not yet received his designation from the Bureau of Prisons. On February 4, 2020, Your Honor granted Mr. Perlman's request for an extension of time to surrender until the earlier of (1) Sunday, March 8, 2020 or (2) five days after he received his designation from the Bureau of Prisons, as he had not yet been designated.

## Request for Extension of Time to Surrender

As of today, February 28, 2020, Mr. Perlman has not yet been designated to an institution by the Bureau of Prisons. In light of Mr. Perlman's financial struggles, and because surrendering in the Southern District of New York would require Mr. Perlman to expend significant funds on airfare, we, with the consent of the Government and Pretrial Services, ask the Court to extend Mr. Perlman's deadline for surrendering to the earlier of (1) Tuesday, April 7, 2020 (30 days after his current date of surrender) or (2) seven days after he receives his designation from the

Bureau of Prisons. This extension would save Mr. Perlman and his family the expense of a flight to New York and it would also save the government the expense of transporting Mr. Perlman from the Southern District of New York to his designated facility.

Respectfully submitted,

Sean Hecker

(by email) cc:

> David Abramowicz and Michael McGinnis Assistant United States Attorneys, Southern District of New York

Jamila Crawford United States Pretrial Services Officer, Northern District of Georgia

Application granted. The Defendant shall Surrender seven days after he receives his designation from the Bureau of Prisons.

80 Ordered.

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